

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

HASSAN KHAN,

Defendant.

INFORMATION

15 Cr. _____

15 CRIM 804

COUNT ONE

(Coercion and Enticement of a Minor to
Engage in Illegal Sexual Activity)

The United States Attorney charges:

1. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years ("Victim-1") to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, KHAN used a computer and the Internet to persuade, induce, entice, and coerce Victim-1, a minor, to engage in sexual acts.

(Title 18, United States Code, Section 2422(b).)

JUDGE RAKOFF

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DATE FILED: 11/18/2015

COUNT TWO

(Coercion and Enticement of a Minor to
Engage in Illegal Sexual Activity)

The United States Attorney further charges:

2. From at least in or about 2008, up to and including at least in or about May 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, unlawfully, willfully, and knowingly, did use a facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, Victim-1, to engage in sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, KHAN used a computer and the Internet to persuade, induce, entice, and coerce Victim-1, a minor, to send images, videos, and live visual depictions of Victim-1 engaging in sexual activity to KHAN over the Internet.

(Title 18, United States Code, Section 2422(b).)

COUNT THREE

(Sexual Exploitation of a Child)

The United States Attorney further charges:

3. From at least in or about 2008, up to and including at least in or about May 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose

of producing a visual depiction of such conduct, and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, which visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and was actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, to wit, among other things, KHAN induced Victim-1, who during the time period was 12 to 15 years old and resided in a foreign country, to send sexually explicit images of herself to KHAN over the internet.

(Title 18, United States Code, Sections 2251(a), (e), and 2.)

COUNT FOUR

(Sexual Exploitation of a Child Outside of the United States)

The United States Attorney further charges:

4. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, willfully and knowingly did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct outside of the

United States, for the purpose of producing visual depictions of such conduct, intending such visual depictions to be transported to the United States by means including by using a means and facility of interstate and foreign commerce, to wit, KHAN induced a minor, Victim-1, who at all relevant times resided outside of the United States, to send images, videos, and live visual depictions of Victim-1 engaging in sexually explicit conduct to KHAN over the Internet.

(Title 18, United States Code, Sections 2251(c)(1),
(c)(2)(A), (e), and 2.)

COUNT FIVE
(Receipt of Child Pornography)

The United States Attorney further charges:

5. From at least in or about 2008, up to and including at least in or about April 2012, in the Southern District of New York and elsewhere, HASSAN KHAN, the defendant, knowingly did receive and distribute material containing child pornography that had been mailed, and using a means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, KHAN received over the internet

live video images sent from a child under the age of 16
containing sexually explicit images of the child.

(Title 18, United States Code, Sections
2252A(a)(2)(B) and (b)(1).)

A handwritten signature in black ink, appearing to read 'P. Bharara', is positioned above a horizontal line.

PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 2422(b); 2251(a) & (e);
2251(c)(1), (c)(2)(A) & (e);
2252A(a)(2)(B) & (b)(1); and 2.)

PREET BHARARA
United States Attorney.
